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March 12, 2025

VIA ECF

Honorable Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18D
New York, New York 10007

Granted.

SO ORDERED:

3/13/2025

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: Charmaine Cooke v. Consolidated Edison of New York, Inc.,
Docket No. 24 Civ. 536 (PAE) (RWL)

Dear Judge Lehrburger:

I am an Associate Counsel in Consolidated Edison Company of New York's ("Con Edison") Law Department and am assigned to represent Con Edison in the above-referenced action. I write to respectfully request that Con Edison's time to respond to the amended complaint, filed by Plaintiff on February 14, 2025, and uploaded to ECF on February 18, be extended from March 14 to April 30, 2025. This is Con Edison's first such request. Plaintiff has stated that she cannot take a position on Con Edison's current request without first obtaining legal advice. The additional time is requested in order for the Defendant to determine whether it will move or answer the amended complaint and prepare the necessary papers. Defendant notes that the amended complaint and exhibits thereto total 77 pages. In addition, Plaintiff has filed yet another action in Bronx Supreme Court (her fourth pending action at this time), seeking redress for her termination from Con Edison under a theory of breach of contract and negligence. The undersigned is also handling that case and is preparing a response to that Complaint at this time.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Iván A. Méndez, Jr.*

Iván A. Méndez, Jr.
Associate Counsel

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Cc: Charmaine Cooke,
Plaintiff, *Pro Se*
(By Electronic Mail)